

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

IN RE: CHANTIX (VARENICLINE)
PRODUCTS LIABILITY
LITIGATION

Master File No. 2:09-CV-2039-IPJ
MDL No. 2092

This Document Relates To:

ALL CASES

Defendant Pfizer Inc.'s Motion for Leave to
File Documents under Seal

**DEFENDANT'S MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

On June 29, 2012, pursuant to Pretrial Order No. 4D (doc. 391) and the Court's Order (doc. 595), Defendant Pfizer Inc. ("Pfizer") intends to file a Reply in support of its Motion for Summary Judgment and Replies in support of its motions to exclude certain opinions offered by Plaintiffs' experts. In support of its Reply briefs, Pfizer anticipates filing a number of exhibits designated as confidential pursuant to the protective order in these proceedings. *See* Pretrial Order No. 3. To maintain the confidentiality of those documents, Pfizer hereby moves the Court to allow Pfizer to file its Reply briefs and/or exhibits accompanying its Reply briefs under seal.

Pfizer respectfully requests that the Court grant this Motion and enter an Order allowing the above-described documents to be filed under seal.

Dated: June 28, 2012

Respectfully submitted,

/s/ Andrew B. Johnson
Andrew B. Johnson
Attorney for Pfizer Inc and
Defendant's Liaison Counsel

OF COUNSEL

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Lead Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the attorneys of record.

s/ Andrew B. Johnson

Andrew B. Johnson
Attorney for Pfizer Inc. and
Defendant's Liaison Counsel